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12 FREESCALE SEMICONDUCTOR, INC.

13  
14 **UNITED STATES DISTRICT COURT**  
15 **NORTHERN DISTRICT OF CALIFORNIA**  
16 **OAKLAND DIVISION**  
17

18 **MEDIATEK INC.,**

19 **Plaintiff,**

20 **v.**

21 **FREESCALE SEMICONDUCTOR, INC.,**

22 **Defendant.**  
23  
24  
25  
26  
27  
28

Civil Action No. 4:11-cv-05341 (YGR)

**DECLARATION OF MARK PATRICK  
IN SUPPORT OF MEDIATEK INC.'S  
STIPULATED ADMINISTRATIVE  
MOTION TO FILE DOCUMENTS  
UNDER SEAL, DOCKET NO. 332**

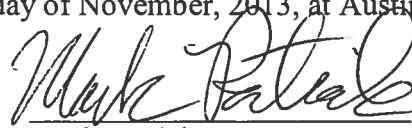
1 I, Mark Patrick, declare as follows:

2 1. I am Law Director, Intellectual Property for Freescale Semiconductor, Inc.  
3 (Freescale). I submit this declaration in support of MediaTek's Stipulated Administrative Motion  
4 to File Documents Under Seal (Motion to Seal), Dkt. No. 332, pursuant to Local Rules 7-11 and  
5 79-5. I have personal knowledge of the facts set forth in this declaration and, if called to testify as  
6 a witness, could and would do so competently.

7 2. **Technical Information Concerning Function and Operation of Freescale**  
8 **Products.** MediaTek seeks to file under seal MediaTek's Opposition to Freescale  
9 Semiconductor, Inc.'s Motion to Strike Certain Portions of MediaTek's Expert Reports  
10 (Opposition) (Dkt. No. 332-5) and Exhibit 1 to Franklin Declaration in Support of MediaTek's  
11 Opposition, Excerpts from MediaTek's Amended Disclosure of Asserted Claims and  
12 Infringement Contentions (Dkt. No. 332-8).

13 3. Attached as Exhibits A and B to this declaration are the versions of MediaTek's  
14 Opposition and Exhibit 1 to Franklin Declaration in Support of MediaTek's Opposition with  
15 Freescale's proposed redactions highlighted in yellow. The identified portions of Exhibit A and  
16 B discuss highly confidential proprietary information about Freescale's source code and specific  
17 features of Freescale's accused products, derived from confidential documents. Disclosure of the  
18 confidential information from Exhibits A and B would significantly harm Freescale by allowing  
19 its competitors to learn detailed information on the function and operation of the accused product  
20 families, including the source code for accused products and the behavior of specific components  
21 and interfaces, such that they may appropriate Freescale's proprietary technology. The requested  
22 relief is necessary and narrowly tailored to protect the confidentiality of this information.  
23 Accordingly, Freescale requests that the Court seal MediaTek's Opposition and Exhibit 1 to  
24 Franklin Declaration in Support of MediaTek's Opposition.

25 I declare under penalty of perjury under the laws of the United States of America that the  
26 foregoing is true and correct. Executed this 26th day of November, 2013, at Austin, Texas.

27   
28 Mark Patrick